

**To:** Washburn, Ben[washburn.ben@epa.gov]  
**From:** Vann, Bradley  
**Sent:** Fri 8/21/2015 5:29:24 PM  
**Subject:** FW: Outstanding CAG Questions

I think you have the answer to Ed's last question too. Awesome, Ben.

Bradley Vann - Remedial Project Manager

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**From:** Ed Smith [mailto:[esmith@moenviron.org](mailto:esmith@moenviron.org)]

**Sent:** Friday, August 21, 2015 11:54 AM

**To:** Bob & Jean Nowlin; Gwendolyn Verhoff; Bill Wilson; Dawn Chapman; Harvey Ferdman; Rhonda Steelman; Doug Clemens; Gale Thackrey; Vernita Wilson; Debi Disser; Erin Harman; Kirby Webster; Terrie Boguski; Vann, Bradley; Washburn, Ben; Mary Catherine; Milward, Mark

**Subject:** Fwd: Outstanding CAG Questions

Dear CAG Tech Committee,

Please see the following answers from the EPA to outstanding questions. I do believe there is at least one outstanding question that has not been answered. What is the contact information for the DOE person responsible for overseeing its obligations at the West Lake Landfill?

Have a great weekend!

Best regards,  
Ed

----- Forwarded message -----

From: **West Lake Landfill / Bridgeton Landfill CAG** <[westlakecag@gmail.com](mailto:westlakecag@gmail.com)>  
Date: Thu, Aug 20, 2015 at 5:03 PM  
Subject: Fwd: Outstanding CAG Questions  
To: Ed Smith <[esmith@moenviron.org](mailto:esmith@moenviron.org)>  
Cc: Bill Wilson <[wtw4591@charter.net](mailto:wtw4591@charter.net)>, Bob Nowlin <[nowlinbobjean@sbcglobal.net](mailto:nowlinbobjean@sbcglobal.net)>, Douglas Clemens <[douglas.clemens@att.net](mailto:douglas.clemens@att.net)>, Lynn Leake <[leakelr@yahoo.com](mailto:leakelr@yahoo.com)>, Rhonda Steelman <[rlsteelstl@yahoo.com](mailto:rlsteelstl@yahoo.com)>

Ed, please forward to the Tech Committee. Thanks.

----- Forwarded message -----

From: **Washburn, Ben** <[washburn.ben@epa.gov](mailto:washburn.ben@epa.gov)>  
Date: Wed, Aug 19, 2015 at 2:22 PM  
Subject: Outstanding CAG Questions  
To: West Lake Landfill / Bridgeton Landfill CAG <[westlakecag@gmail.com](mailto:westlakecag@gmail.com)>

Dear CAG,

The CAG/Technical Committee had these two questions outstanding with EPA. Below are the questions and their responses.

#### **CAG Technical Committee Question:**

Question 1: Do Clean Air Act and the Clean Water Act regulations as enforced by MDNR apply to a Superfund site? Republic is currently under scrutiny for air emissions violations, their permit renewal is in question, and MDNR is requiring observed re-testing and a compliance plan. After numerous letters of violation, this is the last step before the penalty stage. How does this history of non-compliance and violations (not only permit but also of CAA and CWA) affect

EPA's Risk Assessment of the site, and when will EPA step in to assist the state in enforcing a high profile violation (HPV)? (Donna Klocke)

**EPA Response:**

Yes. The Clean Air and Clean Water Acts are enforceable laws at a Superfund site, regardless of federal or state lead authority. In addition, the 2008 Operable Unit 2 (OU2) Record of Decision (ROD) deferred oversight of the Bridgeton Landfill to the state's solid waste management regulatory authority. EPA's role at Bridgeton Landfill is in supporting the state in its ongoing enforcement efforts to ensure Bridgeton is in compliance with all applicable regulatory and permitting requirements. This role does not change for EPA, unless the state is unwilling or unable to enforce such requirements.

**CAG Question:** What substances/chemicals are currently being emitted from the gas flares?

a. *TASC:* TASC received the 2013 Bridgeton Landfill air emissions report from MDNR is waiting to hear if additional information is available from MDNR. Terrie summarized and shared the 2013 report with the CAG technical committee.

**EPA Response:**

In 2014, Bridgeton Landfill conducted testing of landfill gas before combustion by the flares. The results of the testing are available in Bridgeton's May 8, 2015, response to Missouri Department of Natural Resources:

(<http://dnr.mo.gov/env/swmp/facilities/BridgetonSanitaryLandfill-RCP.htm>).

The results indicate that the flares have the potential to emit higher concentrations of sulfur compounds than previously estimated. As the lead agency for administering the Clean Air Act (CAA), MDNR has requested further sampling and air modeling to address concerns regarding the type and amount of compounds being emitted by the flares. Further information from the additional sampling and modeling will be posted on the MDNR's website when available.

Bridgeton landfill is also required to submit an annual summary of its air emissions to MDNR

for each calendar year. The most recent air emissions report was submitted to MDNR for calendar year 2014. For calendar year 2014, Bridgeton Landfill reported emitting particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), sulfur compounds, mercury compounds and volatile organic constituents (VOCs). Please contact MDNR for a copy of this report.

We look forward to continue working with the CAG at the site. Feel free to reach out with more questions once the technical committee has had a chance to meet and discuss any questions for the agency.

Regards,

Benjamin M. Washburn

Public Affairs Specialist

EPA Region 7

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Thank you - West Lake Landfill / Bridgeton Landfill Community Advisory Group

[www.WestLakeCAG.org](http://www.WestLakeCAG.org)

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Ed Smith

Safe Energy Director

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